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August 31, 2020

VIA ECF

The Honorable John G. Koetl
United States District Judge for the
Southern District of New York
500 Pearl Street
New York, NY 10006

Re: PDV USA, Inc. v. Interamerican Consulting Inc., No: 1:20-cv-03699-JGK

Dear Judge Koetl:

This firm represents Defendant Interamerican Consulting Inc. ("Interamerican"), in the above-referenced matter. In accordance with Rule I.E. of Your Honor's Individual Practices, we submit this letter motion, unopposed and on consent of Plaintiff's counsel with whom we met and conferred, to respectfully request that the time to respond to the complaint filed on May 13, 2020 (Dkt. # 1), be extended until September 30, 2020, thirty (30) days from today.

The complaint was served via the Florida Secretary of State and was effective on July 15, 2020. Assuming *arguendo* service was proper, Defendant's time to respond to the complaint was therefore August 5, 2020. The Florida Secretary of State did not notify Defendant Interamerican of the service of the Complaint. The Affidavit of Service was filed on August 12, 2020 (Dkt. # 8).

Interamerican has agreed to waive any service of process defenses pursuant to Rules 12(b)(4) and (5) of the Federal Rules of Civil Procedure. Interamerican respectfully requests the Court for an order extending the time to file a response to the Complaint to September 30, 2020.

This is the first request for an extension. The requested adjournment does not affect any other scheduled dates.

Respectfully,

A handwritten signature in black ink, appearing to read 'K. Lee Boyd'.

Kathryn Lee Boyd

cc: All counsel of record (via ECF)